

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Domenico Broccoli, GLD3, LLC,
Snook-9 Realty, Inc.

Plaintiffs,

v.

NOTICE OF MOTION

No.7:21-cv-06931(KMK)

Lance Ashworth, Mara Farrell,
Greenhouse Consultants Incorporated,
Douglas Mackey, William Sandy,
Stephen Thomson, and Does 1 - 25.

Defendants.

MOVING PARTY:

Defendant Stephen Thomson

**DATE, TIME &
PLACE OF MOTION:**

Pursuant to Court Order (ECF Docket #48)

Defendants' Service of Motion: March 16, 2022

Plaintiffs' Service of Opposition Papers: April 15, 2022

Defendants' Service of Reply Papers: May 6, 2022

Return Date of Motion: May 6, 2022

SUPPORTING PAPERS:

Declaration of Nicholas A. Pascale, Esq., and
Memorandum of Law

RELIEF REQUESTED:

An Order dismissing the Plaintiffs' action against the
moving Defendant pursuant to FRCP 12(b)(6).

ORAL ARGUMENT:

On a date and at a time designated by the Court.

Dated: New Windsor, New York
March 16, 2022

Yours, etc.,

DRAKE LOEB, PLLC

By: /s/ Nicholas A. Pascale, Esq.

NICHOLAS A. PASCALE, ESQ. (NP-5766)
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TO: ALL PARTIES OF RECORD VIA ECF SERVICE

This Motion, along with the other putative Motions to Dismiss (*see* Dkt. Nos. 57, 58), are denied for failure to comply with this Court's Individual Rules. Defendants' proposed Motions will be discussed at the pre-motion conference on April 5, 2022 at 10:30 am, along with the Defendants' letter motions to stay discovery during the pendency of their proposed Motions.

The Clerk of Court is respectfully directed to terminate the motions at Dkt Nos. 50, 51, 52, 54, 56, 57, and 58.

So Ordered.

A handwritten signature in black ink, appearing to be 'N. A. Pascale', written in a cursive style.

April 1, 2022